



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

JUL 06 1987

5HE-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SPECIALTY COATINGS
SEYMOUR S. NEEMS, PRESIDENT
1139 SHERIDAN ROAD
EVANSTON, IL 60626



Re: Sites Connected with Steve Martell
Northeast, Illinois and Northwest, Indiana

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) is presently investigating the circumstances surrounding the presence of hazardous substances at Sites listed in the Attachment. This action will be taken by U.S. EPA pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) 42 U.S.C. §9601 et seq. as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), Pub. L. 99-499. Responsible parties under SARA include the current and former owners or operators, and persons who generated the hazardous substances or were involved in the transport, treatment, or disposal of them at the site(s).

The U.S. EPA is seeking to obtain information from you pursuant to its authority under Section 104(e) of CERCLA as amended, 42 U.S.C. §9604(e), and Section 3007 of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6927, for the purpose of enforcing CERCLA and RCRA and for the purpose of assisting in determining the need for response to a release of hazardous substance(s) under CERCLA. The Administrator of the U.S. EPA has the authority to require any person who generates, stores, treats, transports, disposes, arranges for the disposal of or otherwise handles hazardous wastes and hazardous substances, as those terms are defined in Section 1004(5) of RCRA, 42 U.S.C. §6903(5) and Section 101 of CERCLA to furnish the U.S. EPA with information related to such activities. Pursuant to these statutory provisions, you are hereby requested to submit the following information concerning the Sites and business organizations listed in the Attachment. The relevant time period of these questions is 1955 to 1980.

1. Provide copies of all shipping documents, or other business documents including receipts, and contracts relating to the transportation, storage and/or disposal of waste materials or substances at any of the Sites and business organizations listed in the Attachment.

2. Provide copies of all shipping documents, or other business documents including receipts, and contracts, relating to the transportation, storage and/or disposal of waste materials or substances by business organizations related to Steve Martell or the Sites connected with Steve Martell. (See the Attachment)
3. Identify and describe all business transactions with Mr. David Head, former Secretary-Treasurer for U.S. Scrap Corporation and/or Steve Martell, relating to the transportation, storage and/or disposal of waste materials or substances at the Sites listed in the Attachment.
4. Describe what you requested and/or received from Mr. Martell, Mr. Head, or from any of the business organizations regarding the ultimate disposal location of your waste materials. (See the Attachment)
5. Provide the generic, common or trade name and the chemical composition and character (i.e. liquid, solid, sludge) of the materials transported to, stored and/or disposed of at the Sites or by the business organizations listed in the Attachment.
6. For each waste material identified above, please give the total volume in gallons for liquids and in cubic yards for solids, for which you arranged disposal and list the dates when disposal occurred and the ultimate destination where disposal occurred.
7. Provide copies of all records, including analytical results, and material safety sheets, which indicate the chemical composition and/or chemical character of the waste material(s) transported to, stored, or disposed of at the Sites or by the business organizations listed in the Attachment.
8. Identify the arrangements made to transport hazardous substances to the Sites or with the business organizations listed in the Attachment. Identify the type of transportation used (i.e. tankers, dump trucks, drums), and the person with whom such arrangements were made (name, position, company).
9. Identify the transporter of your hazardous waste and provide former and current addresses.
10. Provide a detailed description of daily disposal practices with regard to hazardous substances during the relevant time period of 1955 through 1980.
11. Provide a list and description of all liability insurance coverage that is or was carried by you, including any self-insurance provisions that relate to hazardous substances and to the sites listed in the Attachment. Include copies of all these insurance policies.

To assist you in answering this request, the information sought pertains to any and all information in your possession, custody or control relating to the operation/cleanup of the above referenced site and to the transportation, storage, and/or disposal of hazardous substances, or the generation of hazardous substances which were ultimately disposed of, or offered for disposal at the site. The relevant time period for this request is from 1955 through 1980.

For purposes of this information request, "shipping documents" shall mean all contracts, agreements, purchase orders, requisitions, pick-up, or delivery tickets, customs forms, freight bills, shipping memoranda, order forms, weight tickets, work orders, manifests, shipping orders, packing slips, shipping logs, bills of lading, invoices, bills, and any other similar documents that evidence discrete transactions involving shipment or the arrangement for shipment of waste materials to or through the above-referenced site. "Waste materials" shall mean hazardous substances, solid wastes and hazardous wastes and other materials which may or may not contain pollutants and shall include reclaimed and off-specification materials of any kind.

This information should be sent to the following:

Ms. Susan Swales (5HE-12)
Waste Management Division
U.S. EPA - Region V
230 South Dearborn Street
Chicago, Illinois 60604

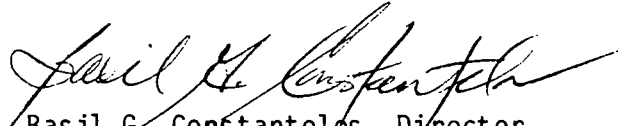
The information sought herein must be sent to U.S. EPA within thirty (30) calendar days of your receipt of this letter. Under Section 3008 of RCRA, 42 U.S.C. §6928, and under Section 104(e)(5) of CERCLA, 42 U.S.C. § 9604(e)(5) failure to comply with this request may result in an enforcement action against you by U.S. EPA.

The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may request however, that such information be handled as confidential business information. A request for confidential treatment must be made when the information is provided, since any information not so identified will not be accorded this protection by the U.S. EPA. Information claimed as confidential will be handled in accordance with the provisions of 40 C.F.R. Part 2.

The written statements submitted pursuant to this request must be notarized and submitted under the signature of a duly authorized corporate official certifying that all information contained therein is true and accurate to the best of the signatory's knowledge and belief and that a diligent search for all documents responsive to this request has been completed. All documents submitted to Region V pursuant to this information request should be certified as true and authentic to the best of the signatory's knowledge and belief. Should the signatory find, at any time after the submittal of the requested information, that any portion of the submitted information is false, the signatory should notify U.S. EPA promptly. If any answer certified as true should be found to be untrue, the signatory can and may be prosecuted pursuant to 18 U.S.C. §1001.

If you need further information regarding this U.S. EPA information request, you may contact Susan Swales of the Hazardous Waste Enforcement Branch at (312) 886-7336.

Sincerely yours,



Basil G. Constantelos, Director
Waste Management Division

Attachment

Sites and Business Organizations
Related to Steve Martell

Business Organizations

U.S. Scrap Corporation
Liquid Engineering Corporation
Penn Central Corporation
Black Oak Development Corporation (Illinois)
U.S. Drum Disposal Corporation
Black Oak Development Corporation (Indiana)
DCC Corporation
Drum Corporation Treatment and Disposal Corporation
Stryker Corporation
Stryker International, Inc.
Paxtion Landfill Corporation
Calumet Land Reclamation Company
Telrio, Inc.
Liquid Waste, Inc.
Environmental Cleaning House Organization (ECHO)
Alburn, Inc.
Chemical Incineration, Inc.

Sites

U.S. Scrap Site - 119 and Cottage Grove, Chicago, IL
Penn Central Site - Between 123rd and 130th Streets, Chicago, IL
9th Avenue Dump - West 9th Avenue and Cline Road, Gary, IN
Paxton Landfill - 119th and Oglesby, Chicago, IL

Swale
UNITED STATES OF AMERICA
ENVIRONMENTAL PROTECTION AGENCY

REGION V
230 SOUTH DEARBORN
CHICAGO, IL 60604

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300



CLAIM CHECK
NO. 685175
☐ HOLD
DATE
1ST NOTICE
2ND NOTICE
RETURN
Detached from
PS Form 3849-A
Oct. 1980

KOE
PC
FW
SPECIALTY COATINGS
SEYMOUR S. NEEMS, PRESIDENT
1139 SHERIDAN ROAD
EVANSTON, IL 60626



● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

<p>3</p> <p>SPECIALTY COATINGS. SEYMOUR S. NEEMS, PRESIDENT 1139 SHERIDAN ROAD EVANSTON, IL 60626</p>	<p>4. Article Number P492538146</p> <p>Type of Service:</p> <table><tr><td><input type="checkbox"/> Registered</td><td><input type="checkbox"/> Insured</td></tr><tr><td><input checked="" type="checkbox"/> Certified</td><td>COD</td></tr><tr><td><input type="checkbox"/> Express Mail</td><td></td></tr></table> <p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>	<input type="checkbox"/> Registered	<input type="checkbox"/> Insured	<input checked="" type="checkbox"/> Certified	COD	<input type="checkbox"/> Express Mail	
<input type="checkbox"/> Registered	<input type="checkbox"/> Insured						
<input checked="" type="checkbox"/> Certified	COD						
<input type="checkbox"/> Express Mail							
5. Signature — Addressee X	8. Addressee's Address (ONLY if requested and fee paid)						
6. Signature — Agent X							
7. Date of Delivery							

PS Form 3811, Feb. 1986

DOMESTIC RETURN RECEIPT